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6 *Attorney for Plaintiff and all others similarly situated*

7  
8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 SHAHROOZ RAHIMIAN, individually  
11 and on behalf of all others similarly  
12 situated,

13 *Plaintiff,*

14 *v.*

15 RACHEL ADRIANO, and JUAN  
16 MARTINEZ, INC.,

17 *Defendants.*

18 Case No. 2:20-cv-02189-GMN-VCF

19 **STIPULATION FOR EXTENSION  
20 OF TIME TO SUBMIT JOINT  
DISCOVERY PLAN AND  
SCHEDULING ORDER**

21 **(First Request)**

22 Plaintiff Shahrooz Rahimian and Defendants Rachel Adriano and Juan Martinez, Inc.  
23 d/b/a Century 21 Americana hereby stipulate, agree, and move the Court to extend the deadline  
24 to file a joint discovery plan and proposed scheduling order for good cause, in support thereof  
25 states as follows:

26 1. On January 25, 2021, Defendant Rachel Adriano answered the complaint,  
27 triggering the March 11, 2021 deadline to file a joint discovery plan and proposed scheduling  
order.

28 2. On February 2, 2021, Plaintiff's counsel and Defendant Adriano's counsel  
conducted a preliminary Rule 26 conference.

3. On February 16, 2021, Plaintiff filed an amended complaint adding Defendant

1 Juan Martinez, Inc. d/b/a Century 21 Americana to this action. Defendant Century 21  
2 Americana's response to the amended complaint is due March 11, 2021.

3 4. Accordingly, in an effort to include Defendant Century 21 Americana in the Rule  
4 26 meeting and provide the Court (and the parties) with a more fulsome and useful discovery  
5 plan reflecting the input of both Defendants in this action, the parties hereby stipulate and agree  
6 to a three and a half week extension of time, up to and including April 6, 2021, within which to  
7 file a joint discovery plan and proposed scheduling order.

8  
9 SO STIPULATED.

10  
11 Respectfully submitted,

12 Dated: March 11, 2021. /s/ Avi R. Kaufman  
13 Avi R. Kaufman (Florida Bar no. 84382)  
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21 *Counsel for Plaintiff  
22 and all others similarly situated*

23 KAEMPFER CROWELL

24 Dated: March 11, 2021. /s/ Robert McCoy  
25 Robert McCoy, No. 9121  
Ryan M. Lower, No. 9108  
26 Briana Martinez, No. 14919  
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Attorneys for Defendants

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

SHAHROOZ RAHIMIAN, individually and on behalf of all others similarly situated,

Case No. 2:20-cv-02189-GMN-VCF

*Plaintiff,*

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RACHEL ADRIANO, and JUAN  
MARTINEZ, INC.,

**ORDER GRANTING  
STIPULATION FOR EXTENSION  
OF TIME TO SUBMIT JOINT  
DISCOVERY PLAN AND  
PROPOSED SCHEDULING ORDER**

### *Defendants.*

On review and consideration of Plaintiff Shahrooz Rahimian and Defendants Rachel Adriano and Juan Martinez, Inc. d/b/a Century 21 Americana stipulation to extend the deadline to file a joint discovery plan and proposed scheduling order and the record, the Court finds good cause to extend the deadline to submit a joint discovery plan and proposed scheduling order.

In an effort to include Defendant Century 21 Americana in the Rule 26 meeting and provide the Court (and the parties) with a more fulsome and useful discovery plan reflecting the input of both Defendants in this action, the Court GRANTS the parties' stipulation and provides a three and a half week extension of time, up to and including April 6, 2021, within which to file a joint discovery plan and proposed scheduling order.

IT IS SO ORDERED.

Honorable Cam Ferenbach  
UNITED STATES MAGISTRATE JUDGE

DATED: 3-18-2021